

**Anna M. Richmond**

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**From:** Lafferty, Riane <rlafferty@bsk.com>  
**Sent:** Friday, May 27, 2022 5:52 PM  
**To:** Anna Richmond  
**Cc:** Liza Tommaney; Hickey, Michael  
**Subject:** RE: Matalavage and NCSD et al

The informal agreement is fine. Thanks. Have a nice weekend.

**Riane Lafferty**  
716.416.7030 Direct  
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**From:** Anna Richmond <annamarierichmondsg@gmail.com>  
**Sent:** Friday, May 27, 2022 2:59 PM  
**To:** Lafferty, Riane <rlafferty@bsk.com>  
**Cc:** Liza Tommaney <liza@tommaneylegal.com>; Hickey, Michael <mhickey@bsk.com>  
**Subject:** Re: Matalavage and NCSD et al

**External Email:** Use caution before clicking links or opening attachments.

Thank you, Riane.

Are you folks comfortable with this informal agreement between counsel regarding the extension to the expert deadlines, or would you prefer us to memorialize it in a request to the Judge?

We look forward to receiving Defendants' supplemental responses next week.

Have a pleasant holiday.

AMR

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Thank you.

On Fri, May 27, 2022 at 11:12 AM Lafferty, Riane <[rlafferty@bsk.com](mailto:rlafferty@bsk.com)> wrote:

Liza,

That is fine with us.

Regarding our response to your January 28, 2022 letter, we have received most of the additional documentation but are still waiting on a few additional items. Also, our office closes at 3 p.m. today and I will not be able to finish reviewing and bates numbering the documents that we do have. We will have our response to you next week.

Best regards,

Riane

**Riane Lafferty**

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**From:** Liza Tommaney <[liza@tommaneylegal.com](mailto:liza@tommaneylegal.com)>  
**Sent:** Friday, May 27, 2022 11:05 AM  
**To:** Lafferty, Riane <[rlafferty@bsk.com](mailto:rlafferty@bsk.com)>; Hickey, Michael <[mhickey@bsk.com](mailto:mhickey@bsk.com)>  
**Cc:** Anna M. Richmond, Esq. <[annamarierichmondsg@gmail.com](mailto:annamarierichmondsg@gmail.com)>  
**Subject:** Matalavage and NCSD et al

**External Email:** Use caution before clicking links or opening attachments.

Good Morning,

We were informed last night that our expert witness was diagnosed with Covid-19 yesterday. In light of his diagnosis we are requesting an extension of time for his report. The report is currently due June 1, 2022; we propose an extension until June 15, 2022. We propose extending out all of the dates in paragraph 3 of the Second Amended Scheduling Order by two weeks. The balance of the dates on the order would remain in place.

Please advise if you agree to the two week extension of the dates in paragraph 3.

Thank-you. Liza

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